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RASIER, LLC; and RASIER-CA, LLC
17

18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**
20 **SAN FRANCISCO DIVISION**

21 IN RE: UBER TECHNOLOGIES, INC.,
22 PASSENGER SEXUAL ASSAULT
23 LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF BRETT D. HARRISON
AND FTI CONSULTING, INC.**

24 This Document Relates to:

25 ALL ACTIONS
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1 **DECLARATION OF BRETT D. HARRISON AND FTI CONSULTING, INC.**

2 I Brett D. Harrison, am a Senior Managing Director within FTI Consulting, Inc.'s ("FTI")
3 Technology Segment. I currently lead FTI's Digital Forensics Practice. I have over thirty years of
4 experience assisting clients with Digital Forensic and Electronic Discovery (e-Discovery) related
5 engagements. Since joining FTI, I have led many dozens of engagements involving the investigation
6 of Intellectual Property (IP) theft, forensic data collection and the processing and analysis of data.

7 Prior to my employment with FTI, I was employed by the Federal Bureau of Investigation
8 (FBI) for fifteen years. For seven of those years (from 1999 until 2006), I worked within the FBI's
9 Computer Analysis Response Team (CART) Unit in Washington, D.C. The FBI's CART Unit is
10 responsible for the forensic acquisition and processing of all computers which are examined by the
11 FBI. During my tenure with the CART Unit, I worked as both an FBI Certified Forensic Examiner of
12 computer evidence and as a Program Manager. As a Computer Forensic Examiner, I conducted
13 acquisitions and forensic examinations of a wide range of computers including laptops, desktops and
14 servers as well as computers which utilized both Windows and UNIX operating systems.

15 Following my certification as a Forensic Examiner, I also served as a Program Manager within
16 the CART Unit and was responsible for ensuring that the FBI's 400 Forensic Examiners of computer
17 evidence had the necessary knowledge, skills and tools required to perform forensic examinations. As
18 a Program Manager, I focused on leading the development of custom and semi-custom forensic tools
19 to allow the FBI's Forensic Examiners to accurately collect, preserve, and process data from computer
20 systems.

21 During the course of my career, I have conducted many hundreds of forensic analyses and have
22 authored hundreds of forensic reports. I have testified in court twenty times in both civil and criminal
23 matters. I have provided numerous written declarations and reports and have been deposed several
24 times. I have worked on both the plaintiff and defendant sides of many engagements and have even
25 served in a "neutral" capacity on numerous occasions.

26 FTI is a well-respected, independent, global business advisory firm dedicated to helping
27 organizations manage change, mitigate risk, and resolve disputes: financial, legal, operational,
28 political & regulatory, reputational, and transactional. The organization has more than 8,000

1 consultants and professionals in approximately 27 countries, and every year, FTI helps many
2 thousands of organizations globally transform the way they anticipate and respond to events. The
3 scope of FTI's clients includes, but is not limited to, many of Fortune's Global 100 corporations. I
4 am supported by hundreds of dedicated digital forensics, cybersecurity, incident response, and data
5 and analytics consultants, with cross-functional teams led by those with decades of experience at the
6 highest levels of law enforcement, intelligence, and global private sector institutions

7 FTI is being compensated for work in this matter at its currently standard hourly rates charged
8 for each person working on the project. FTI's rates range from \$225/hour to \$895/hour—depending
9 on the practitioner. Generally, simple forensic work is performed by lower bill rate practitioners, and
10 more complex expert reporting and testimony work is performed by more senior practitioners. My
11 current rate is \$895/hour.

12 No part of my or FTI's compensation is dependent on the contents of this Declaration, the
13 substance of any further opinions I may offer, or the ultimate outcome of this matter.

14 I have been asked to compare and analyze 7 Uber receipts which were produced by Plaintiffs
15 and which purport to show evidence of Uber ride activity by that Plaintiff. I visually scrutinized the
16 receipts to look for discrepancies.

17 I also reviewed and compared the population of actual receipts produced from Uber as part of
18 the defendant fact sheet ("DFS") process. Appendix A contains the bates numbers of files I reviewed.

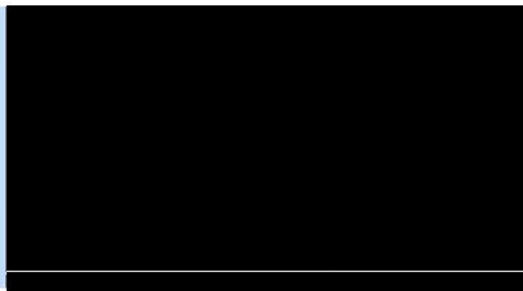
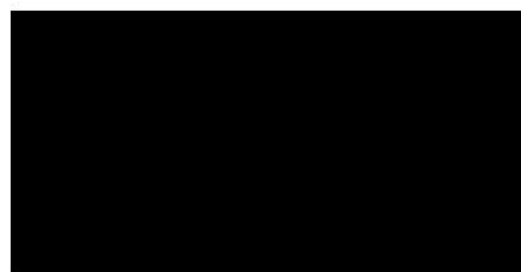
19 During my review, I relied upon other members of the FTI Technology practice working under
20 my direction. Any reference to "I," "my" or "FTI" include my efforts as well as those working under
21 my supervision.

22 I understand, based on my knowledge, experience and research, that reviewing PDF metadata
23 can provide insight into a PDF file's origin, history, and authenticity. I reviewed file metadata to show
24 what particular software was used to create and produce the Uber PDF receipts.

25 The 7 Uber receipts I reviewed contained evidence of being changed or edited. My conclusions
26 are based on evidence that includes discrepancies in content and formatting including characters,
27 address locations, punctuation, fees, fee totals, payment types, date and timestamps, ride duration, map
28 image, and rider names. Below are the details of my analysis:

3666 123472.pdf

I reviewed the content of the file named "3666_123472.pdf" to determine whether there was an indication that the receipt file content was fabricated, changed or edited. I understand that Plaintiff produced this file during the course of the litigation. Additionally, I reviewed receipts produced from Uber as part of the DFS process. I noted that "3666_123472.pdf" appeared to be a modified version of an original receipt from Uber's system ("3666 - Real Receipt.pdf") based on matching the exact dollar-cents amount for Total, dollar-cents for Trip fare, pickup time, pickup address, drop-off time and drop-off address. The alteration appeared to have edited the date, so it showed "[REDACTED]". I observed an inconsistent white line between the total and the date. I observed an inconsistent dollar sign (\$) character being used. I observed inconsistent black lines under the number 8, the dot character, and the number 9. I noted that the embedded metadata indicated the file was created by "Adobe Acrobat Pro (64-bit) 24.5.20421" and produced by "Adobe Acrobat Pro (64-bit) 24.5.20421" and not Uber's PDF receipt creator "wkhtmltopdf" and producer "Qt".

**Plaintiff submitted 3666_123472.pdf****Exemplar 3666 - Real Receipt.pdf****3699 127104.pdf**

I reviewed the content of the file named "3699_127104.pdf" to determine whether there was an indication that the Uber receipt file content was fabricated, changed or edited. I understand that Plaintiff produced this file during the course of the litigation. I noted that "3699_127104.pdf" appeared to be a modified version of original receipt from Uber's system ("3699 - Real Receipt - Email Version.pdf") and ("3699 - Real Receipt - Mobile Version.pdf") based on matching the exact dollar-cents amount for Total, Trip fare, Subtotal, Booking Fee, pickup time, pickup address, drop-off time and drop-off address. The alteration appeared to have edited rider name so it showed "[REDACTED]". I observed an inconsistent font type for the letters "a" in the rider name "[REDACTED]" when compared to

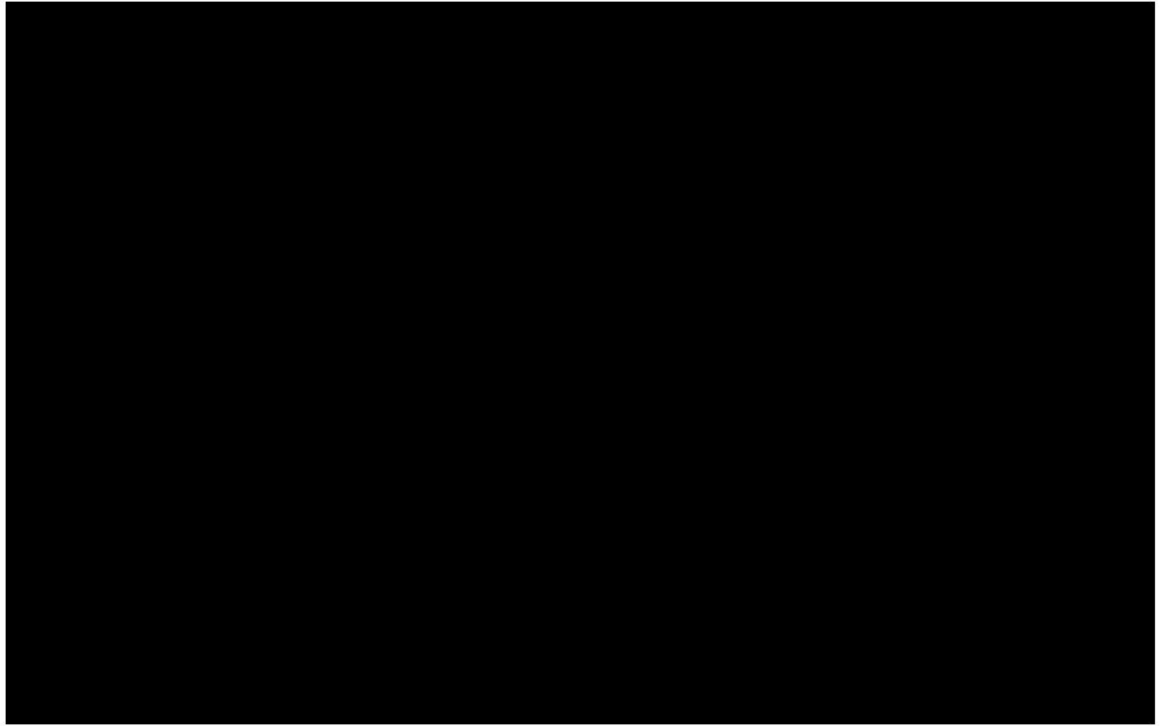
1 the word "Thanks". I noted that the embedded metadata indicated the file was created by "[Cognito
2 Forms]" and produced by "Adobe Acrobat Pro (64-bit) 24.3.20112" and not Uber's PDF receipt
3 creator "wkhtmltopdf" and producer "Qt".

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11 **Plaintiff submitted 3699_127104.pdf**

Exemplar 3666 - Real Receipt.pdf

12 **3787_135524.pdf**

13 I reviewed the content of the file named " 3787_135524.pdf" to determine whether there was
14 an indication that the receipt file content was fabricated, changed or edited. I understand that Plaintiff
15 produced this file during the course of the litigation. I noted that " 3787_135524.pdf" appeared to be
16 a modified version of original receipt from Uber's system ("3787 - Real Receipt.pdf") based on
17 matching the exact dollar-cents amount for Total, dollar-cents for Trip fare, pickup time, pickup
18 address, drop-off time and drop-off address. The alteration appeared to have changed the rider name
19 from "[REDACTED]" to "[REDACTED]". I observed an inconsistent word alignment where the rider name "[REDACTED]"
20 appeared to be aligned lower than the other characters in the line. I noted that the embedded metadata
21 indicated the file was created by "[REDACTED]" using "Acrobat PDFMaker 24 for Word" and
22 produced by "Adobe PDF Library 24.3.144" and not Uber's PDF receipt creator "wkhtmltopdf" and
23 producer "Qt".

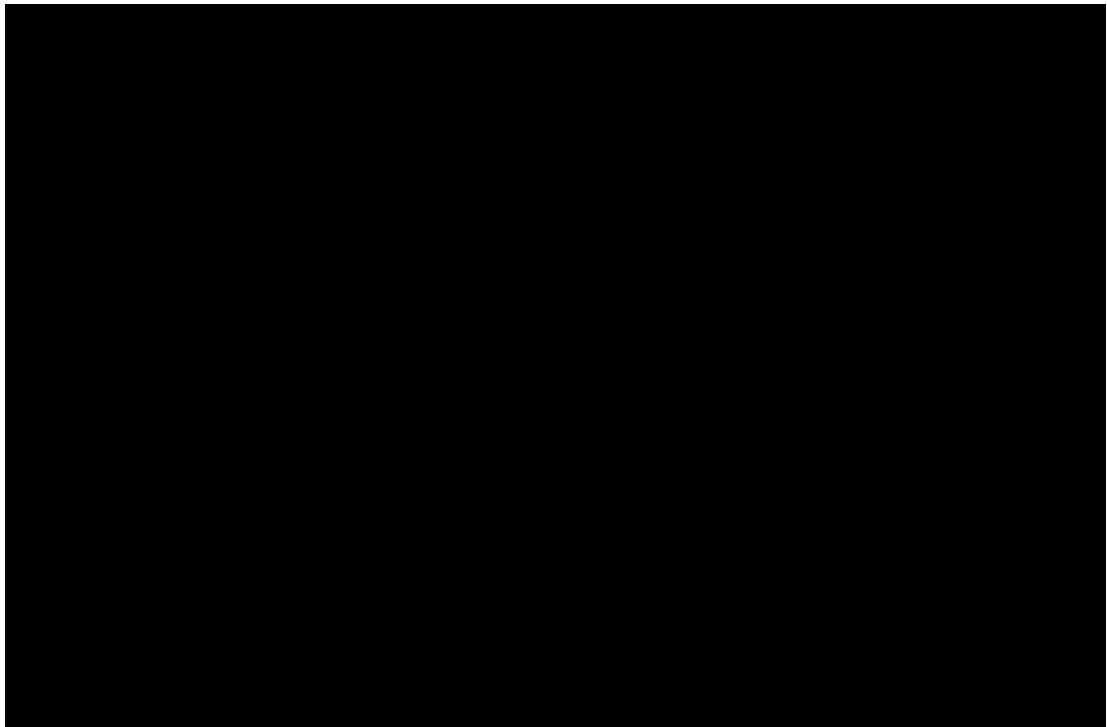


Plaintiff submitted 3787_135524.pdf

Exemplar 3787 - Real Receipt.pdf

3877 143837.pdf

I reviewed the content of the file named " 3877_143837.pdf" to determine whether there was an indication that the receipt file content was fabricated, changed or edited. I understand that Plaintiff produced this file during the course of the litigation. I noted that "3877_143837.pdf" appeared to be a modified version of a version of the original receipt from Uber's system ("3877 - Real Receipt - Email Version.pdf") based on matching the exact dollar-cents amount for Total, dollar-cents for Trip fare, pickup time, pickup address, drop-off time and drop-off address. The alteration appeared to have edited changed the rider name from "[REDACTED]" to "[REDACTED]" and the ride date from [REDACTED] to [REDACTED]. I observed an inconsistent payment timestamp of "[REDACTED]" occurring before the ride began. I noted that the embedded metadata indicated the file was created by "Adobe Acrobat 25.1" and produced by "Adobe Acrobat 25.1 Image Conversion Plug-in" and not Uber's PDF receipt creator "wkhtmltopdf" and producer "Qt".



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12 **Plaintiff submitted 3877_143837.pdf Exemplar 3877 - Real Receipt - Email Version.pdf**
13 **3921 145109.pdf**

14 I reviewed the content of the file named "3921_145109.pdf" to determine whether there was
15 an indication that the receipt file content was fabricated, changed or edited. I understand that Plaintiff
16 produced this file during the course of the litigation. Additionally, I reviewed receipts produced from
17 Uber as part of the DFS process. I noted that "3921_145109.pdf" appeared to contain bolded fonts
18 inconsistent with an Uber receipt. I noted that the top four lines of the receipt extended beyond the
19 expected alignment right. I noted that the ride duration contained an inconsistent "s" in the word
20 "mins" and the word appeared inconsistently on the same line as the numeric minutes. I observed an
21 inconsistent payment timestamp of "[REDACTED]" which occurred before the ride began. I noted that the
22 embedded metadata indicated the file was created by "Forma" and produced by "iOS Version 18.6
23 (Build 22G5064d) Quartz PDFContext" and not Uber's PDF receipt creator "wkhtmltopdf" and
24 producer "Qt".
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Plaintiff submitted 3921_145109.pdf

Exemplar 3962 - Real Receipt.pdf

3962_147976.pdf

I reviewed the content of the file named "3962_147976.pdf" to determine whether there was an indication that the receipt file content was fabricated, changed or edited. I understand that Plaintiff produced this file during the course of the litigation. I noted that "3962_147976.pdf" appeared to be a modified copy of an original receipt from Uber's system ("3962 - Real Receipt.pdf"). I observed that a trip identifier was embedded with a hyperlink [REDACTED] [REDACTED] which is the trip identifier for "3962 - Real Receipt.pdf". I noted that the date displayed in top right contained a partially truncated number "3". I noted that the date was changed from "[REDACTED]" to "[REDACTED]". I observed an inconsistent payment timestamp of "[REDACTED]" which occurred before the ride began. I noted that the address locations, fees, fee totals, payment types, date and timestamps, ride duration, map image, and rider names were all changed. I noted that the embedded metadata indicated the file was created by "Microsoft® Word 2019", by author "DELL", and produced by "Microsoft® Word 2019" and not Uber's PDF receipt creator "wkhtmltopdf" and producer "Qt".

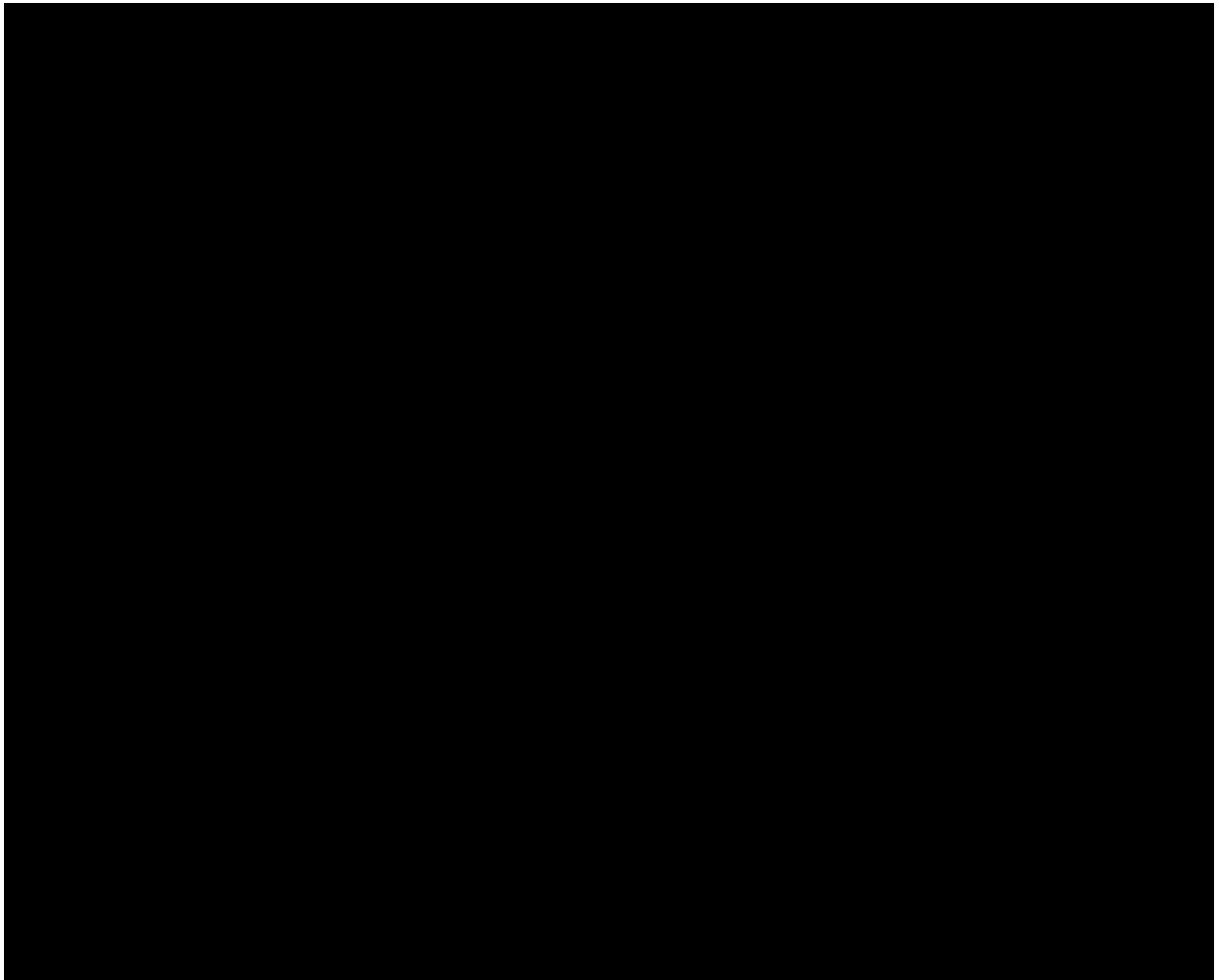
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9 **Plaintiff submitted 3962_147976.pdf**

Exemplar 3962 - Real Receipt.pdf

10 **3977 148014.pdf**

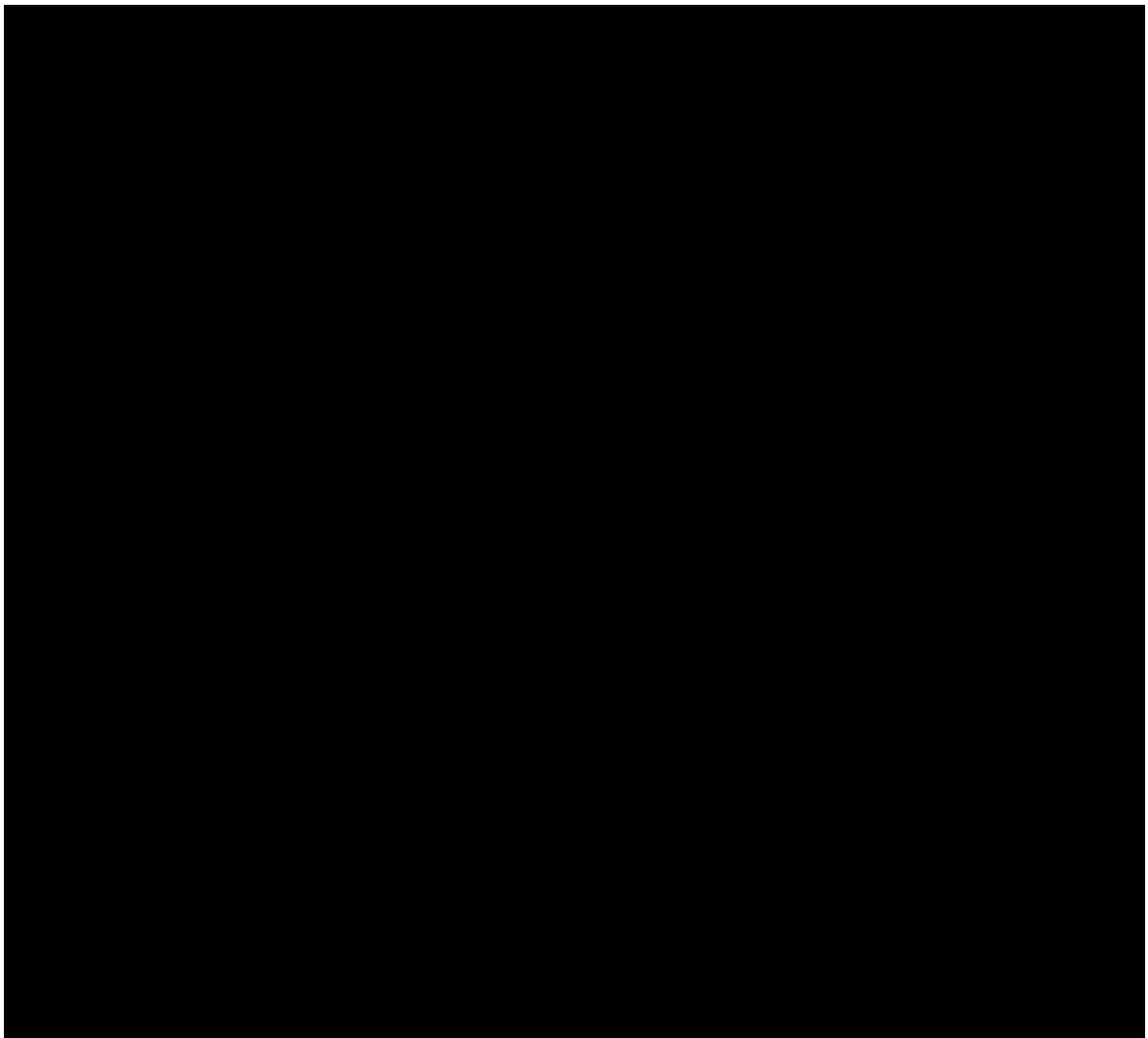
11 I reviewed the content of the file named "3977_148014.pdf" to determine whether there was
12 an indication that the receipt file content was fabricated, changed or edited. I understand that Plaintiff
13 produced this file during the course of the litigation. I observed the "Trip ID: [REDACTED]
14 [REDACTED]" was the trip identifier for a receipt from Uber's system ("3977 - Real Receipt -
15 Email Version.pdf"). I noted that "3977_148014.pdf" appeared to be a modified version of a receipt
16 from Uber's system ("3977 - Real Receipt - Email Version.pdf") based on matching the exact dollar-
17 cents amount for Total, dollar-cents for Trip fare, pickup time, pickup address, drop-off time and drop-
18 off address. The alteration appeared to have edited changed the rider name from "[REDACTED]" to
19 "[REDACTED]". I observed an inconsistent payment timestamp of "[REDACTED]" which occurred before the
20 ride began. I noted that the date was changed from "[REDACTED]" to "[REDACTED]". I noted
21 that the embedded metadata indicated the file was created by "Adobe Acrobat 25.1" and produced by
22 "Adobe Acrobat 25.1 Image Conversion Plug-in" and not Uber's PDF receipt creator "wkhtmltopdf"
23 and producer "Qt".
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Plaintiff submitted 3977_148014.pdf

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Exemplar 3977 - Real Receipt - Mobile Version.pdf Exemplar 3977 - Real Receipt - Email Version.pdf

I declare under penalty of perjury that the foregoing is true and correct. Executed on 10/09/2025.

Brett D. Harrison
Senior Managing Director
FTI Consulting Technology

A handwritten signature in black ink, appearing to read "B. Harrison", is written over a horizontal line.

Brett D. Harrison

Attachment 1

Documents Considered

List of Documents Considered

UBER-MDL3084-DFS00001272	[REDACTED]
UBER-MDL3084-DFS00001697	[REDACTED]
UBER-MDL3084-DFS00006581	[REDACTED]
UBER-MDL3084-DFS00007746	[REDACTED]
UBER-MDL3084-DFS00007750	[REDACTED]
UBER-MDL3084-DFS00009723	[REDACTED]
UBER-MDL3084-DFS00009977	[REDACTED]
UBER-MDL3084-DFS00009979	[REDACTED]
UBER-MDL3084-DFS00010299	[REDACTED]
UBER-MDL3084-DFS00010527	[REDACTED]
UBER-MDL3084-DFS00010529	[REDACTED]
UBER-MDL3084-DFS00010780	[REDACTED]
UBER-MDL3084-DFS00010859	[REDACTED]
UBER-MDL3084-DFS00011479	[REDACTED]
UBER-MDL3084-DFS00011608	[REDACTED]

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UBER-MDL3084-DFS00012254	[REDACTED]
UBER-MDL3084-DFS00012529	[REDACTED]
UBER-MDL3084-DFS00013036	[REDACTED]
UBER-MDL3084-DFS00013040	[REDACTED]
UBER-MDL3084-DFS00013276	[REDACTED]
UBER-MDL3084-DFS00013309	[REDACTED]
UBER-MDL3084-DFS00014299	[REDACTED]
UBER-MDL3084-DFS00014303	[REDACTED]
UBER-MDL3084-DFS00015016	[REDACTED]
UBER-MDL3084-DFS00015269	[REDACTED]
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UBER-MDL3084-DFS00016409	[REDACTED]
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UBER-MDL3084-DFS00016465	[REDACTED]
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UBER-MDL3084-DFS00024304	[REDACTED]
UBER-MDL3084-DFS00024905	[REDACTED]
UBER-MDL3084-DFS00025489	[REDACTED]

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UBER-MDL3084-DFS00026828	[REDACTED]
UBER-MDL3084-DFS00029433	[REDACTED]
UBER-MDL3084-DFS00029606	[REDACTED]
UBER-MDL3084-DFS00029684	[REDACTED]
UBER-MDL3084-DFS00033000	[REDACTED]
UBER-MDL3084-DFS00033002	[REDACTED]
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UBER-MDL3084-DFS00106919	[REDACTED]
UBER-MDL3084-DFS00107026	[REDACTED]
UBER-MDL3084-DFS00107172	[REDACTED]
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UBER-MDL3084-DFS00154518	[REDACTED]
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UBER-MDL3084-DFS00210889	[REDACTED]
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UBER-MDL3084-DFS00218918	[REDACTED]
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UBER-MDL3084-DFS00224142	[REDACTED]
UBER-MDL3084-DFS00224449	[REDACTED]
Plaintiff Receipt (MDLC)	3666_123472.pdf

Uber DFS (MDLC)	3666_128627.pdf
Plaintiff PFS (MDLC)	3666_135784.pdf
Plaintiff Receipt (MDLC)	3699_127104.pdf
Uber DFS (MDLC)	3699_136978.pdf
Plaintiff PFS (MDLC)	3699_138644.pdf
Plaintiff Receipt (MDLC)	3787_135524.pdf
Uber DFS (MDLC)	3787_142528.pdf
Plaintiff PFS (MDLC)	3787_147982.pdf
Plaintiff Receipt (MDLC)	3877_143837.pdf
Plaintiff Receipt (MDLC)	3921_145109.pdf
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N/A	3877 – Real Receipt – Email Version.pdf
N/A	3962 – Real Receipt.pdf
N/A	3977 – Real Receipt – Email Version.pdf
N/A	3977 – Real Receipt – Mobile Version.pdf

Attachment 2

List of Publications and Prior Testimony

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Publications

2021 – Co-authored an article related to new methods for analyzing mobile devices to determine whether they have been infected and/or hacked.

2021 – Co-authored an article on “Discovery in the Cloud.” The article focused on taking a close look at the risks and challenges, specifically with respect to Dropbox.

2015 – Co-authored an article on Information Management.com titled “Forensic Files: Lessons from Real Cases” which dealt with collecting data from social media sites and mobile, BYOD devices.

Testimony, Reporting, Deposition and Declaration

11/10/2023 Nashville US District Court; Ecolab Inc. v. Anthony Ridley and Chemtreat, Inc. Retained by the Special Master and submitted an Expert Report related to activities observed on a number of computers.

6/29/2023 San Francisco US District Court; Wisk Aero v. Archer Aviation Submitted a Second Supplemental Expert Rebuttal Report in Support of Archer Aviation

4/26/2023 San Francisco US District Court; Wisk Aero v. Archer Aviation Submitted a Declaration in Support of Archer’s Opposition to Wisk’s Motion for Adverse Inferences

4/21/2023 Applied Predictive Technologies, Inc. v. Marketdial, Inc. et al. Provided Deposition testimony related to a number of Intellectual Property Theft related topics outlined in Expert Rebuttal Report dated 2/8/2023.

4/4/2023 San Francisco US District Court; Wisk Aero v. Archer Aviation Submitted a Supplemental Expert Rebuttal Report in Support of Archer Aviation

2/15/2023 San Francisco US District Court; Wisk Aero v. Archer Aviation Submitted a Sur-Reply Declaration in Support of Archer Opposition to Wisk's Spoliation Motion

2/8/2023 Applied Predictive Technologies, Inc. v. Marketdial, Inc. et al. Submitted an Expert Report related to the exfiltration and use of certain electronic Intellectual Property materials.

2/7/2023 San Francisco US District Court; Wisk Aero v. Archer Aviation Provided Deposition testimony related to a number of Intellectual Property Theft related topics outlined in Expert Rebuttal Report dated 1/27/2023.

1/27/2023 San Francisco US District Court; Wisk Aero v. Archer Aviation Submitted an Expert Rebuttal Report related to multiple topics surrounding potential misappropriation of electronic documents.

5/2/2022 San Francisco US District Court; Wisk Aero v. Archer Aviation Submitted a Declaration in support of certain Third Parties in opposition to a Wisk Aero LLC Motion to Compel Forensic Inspections.

2/11/2022 New York US District Court; George Galgano v. County of Putnam, New York, et al. Submitted an Affidavit which outlined FTI's process for organizing and threading TXT messages exported off mobile devices.

7/1/2021 San Francisco US District Court; Wisk Aero v. Archer Aviation Provided Deposition testimony to support a Declaration which documented the investigation and analysis of Archer's systems to attempt to locate any Wisk Aero Intellectual Property. Testimony covered multiple FTI workstreams to include Digital Forensics and also Brainspace analysis of Archer data.

6/24/2021 San Francisco US District Court; Wisk Aero v. Archer Aviation Submitted a Declaration to document FTI's investigation and analysis of Archer's systems to attempt to locate any Wisk Aero Intellectual Property. The Declaration covered multiple FTI workstreams to include Digital Forensics and also Brainspace analysis of Archer data.







Declaration of Brett D. Harrison and FTI Consulting Inc_

Final Audit Report

2025-10-10

Created:	2025-10-09
By:	Deborah Hillburn (dhillburn@shb.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAACNCFPJSLfmcgaDODkpjjsQt6daInVDXZ

"Declaration of Brett D. Harrison and FTI Consulting Inc_" History

-  Document created by Deborah Hillburn (dhillburn@shb.com)
2025-10-09 - 8:41:34 PM GMT
-  Document emailed to brett.harrison@fticonsulting.com for signature
2025-10-09 - 8:41:42 PM GMT
-  Email viewed by brett.harrison@fticonsulting.com
2025-10-10 - 0:20:19 AM GMT
-  Signer brett.harrison@fticonsulting.com entered name at signing as Brett D Harrison
2025-10-10 - 0:25:10 AM GMT
-  Document e-signed by Brett D Harrison (brett.harrison@fticonsulting.com)
Signature Date: 2025-10-10 - 0:25:12 AM GMT - Time Source: server
-  Agreement completed.
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